

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE DISTRICT OF PUERTO RICO

IN RE:	*	Case # 97-14400 (ESL)
	*	Chapter 7 (Asset Case)
ALFONSO HERNANDEZ		
ORTIZ	*	
TRUSTEE	*	
WIGBERTO LUGO MENDER		
	*	
*****	*	

**APPLICATION FOR COMPENSATION OF SPECIAL COUNSEL
TO THE HONORABLE COURT:**

COMES NOW, Garcia- Arregui & Fullana PSC and very respectfully states and prays:

1. On December 12, 2006, applicant was retained by the trustee as special counsel pursuant to the provisions of section 327 of the Bankruptcy Code. 11 U.S.C.A. ' 327; to represent the trustee.
2. Applicant in the fulfillment of its duties as special counsel for trustee has had numerous conferences with trustee as well as counsel for other parties including, counsel for counsel for Scotiabank and other related to a complaint filed for foreclosure of property on which the Estate has a real property interest. Regarding said foreclosure proceedings, the same concluded after the interest that the Estate had on special partnership Heroal S.E. was bought for the amount of \$45,000.00 for the benefit of the Estate. (see dockets 1306, 1307,1310)Special counsel has appeared before this Honorable Court and before the State Court at all instances required representing the interest of the Estate and its Trustee.
- 3 resolution by the Bankruptcy Court. Additionally counsel is addressing a collection and foreclosure matter filed by Scotiabank pertaining to property originally included as

4. Attached hereto and made parte hereof is a statement showing with more detail and particularity the services rendered by applicant extracted from Applicant's time records; for the time period of November 1, 2015 up and including March 31, 20165

6. Applicant has performed the services which will be set forth in hereto and which services have been performed on an hourly basis, at a the rate of \$200.00 per hour for Isabel M. Fullana admitted to practice before the Supreme Court of Puerto Rico on November 6, 1979. Associates work is charged on an hourly basis at the rate of 125.00. Paralegal work is charged on an hourly basis at rate of \$90.00 per hour. The aforesaid rates are considered to be reasonable considering the nature of the case, the work performed and which are similar to the rates charged by applicant to non-bankruptcy clients for similar services.

7. The source of the funds to be paid to Applicant by Trustee if authorized by this Honorable court, shall be from Estate's funds available and or in the custody of the Trustee.

8. As set forth the total services performed by Garcia- Arregui & Fullana Law Firm amounts to \$ 5,922.50 and \$ 89.44 for expenses.

9. There is no agreement on the part of Applicant for the sharing of any of the compensation received or to be received, except customary payments to members, partners and regular associates of the firm.

10. Applicant has forwarded copy of this application to the trustee who has determined that the fees requested are fair and reasonable.

NOTICE

Unless an objection to the Application is filed **within twenty one (21) days** from service of this notice, an order may be entered approving the same without an actual hearing and should a timely objection be filed, the Court will then schedule a hearing.

WHEREFORE, it is respectfully prayed that an order be entered approving the present application for compensation as special counsel for \$5,922.50 and \$ 89.44 for expenses due to applicant and for any other and further relief as it may seem just and proper.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 7th day of April 2016

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Bankruptcy Court using CM/ECF system which will send electronic notification to the following, Trustee Wigberto Lugo Mender, the US trustee's office and to any other party in interest that has requested notice.

S/ ISABEL M FULLANA
GARCIA- ARREGUI & FULLANA
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UNSWORN DECLARATION UNDER PENALTY OF PERJURY

The undersigned certifies under penalty of perjury that he has read the foregoing application subscribed by him, and to the best of his knowledge and belief formed after reasonable inquiry the compensation and expense reimbursement sought conform to the United States Bankruptcy Court for the District of Puerto Rico's Guideline for Compensation and Expense Reimbursement for Professional the fee for services is billed in accordance with the practice no less favorable to the Debtor that those customary utilized by Applicant generally.

S/ Isabel M. Fullana

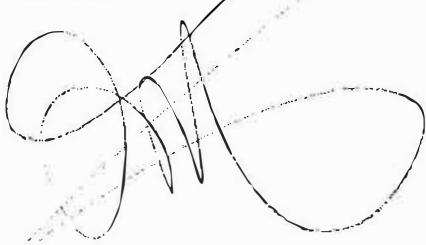
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Alfonso Hernandez Ortiz
2225 PONCE BY PASS
SUITE 709
PONCE PR 00717-1379

April 06, 2016

Invoice # 11057



Professional Services

		<u>Hours</u>	<u>Amount</u>
11/12/2015	IMF Draft application for compensation notice to creditors.	1.50	300.00
11/17/2015	EDC phone call with Atty. Lemuel Negrón regarding CRIM debt certification of Parra Building Apartment.	0.20	25.00
11/18/2015	EDC Drafted memo to client explaining case status and possible new strategy.	2.30	287.50
11/23/2015	IMF Phone conference / RE: reply to memo.	0.60	120.00
11/25/2015	EDC Email to client.	0.60	75.00
12/4/2015	IMF Draft motion, no objection to fees.	0.60	120.00
12/10/2015	IMF Re: Offer from Lic. Negrón, Discussion and confirmation of terms of offer.	0.60	120.00
12/11/2015	EDC Drafted memo to client regarding offer received from Atty. Negrón.	1.40	175.00
12/14/2015	IMF Review final draft of memo to Lic. Lugo. Re: offer.	0.60	120.00
	EDC Drafted memo to client regarding offer from Dr. Hernández and recommendation after talking to Atty. Negrón.	1.50	187.50
	IMF phone conference Lic. Negrón, RE: offer regarding participation in special partnership.	0.60	120.00

		<u>Hours</u>	<u>Amount</u>
12/18/2015	EDC Amendment draft of letter of counter offer to Atty. Lemuel Negrón, RE: apartment in Parra building.	1.00	125.00
	IMF Review final draft letter to Lic Lemuel, RE: offer and signing.	0.60	120.00
1/15/2016	IMF Lemuel Negrón / confirmation of offer phone call to Lic. Lugo to inform the same.	0.30	60.00
1/26/2016	IMF Review draft notice of proposed sale.	0.60	120.00
2/12/2016	IMF Phone conference with trustee, RE: tender payment of offer to buy participation, special partnership HEORAL, Conference with trustee.	0.80	160.00
2/15/2016	EDC Meeting and discussion with Atty. Fullana as to notice and objection language to be included in notice of sale.	0.80	100.00
	EDC Amendment notice of sale of HEORAL participation to debtor.	1.20	150.00
	IMF Discussion amended notice of sale.	0.60	120.00
2/16/2016	EDC Drafted certificate of service of the servicing of Notice of Sale.	0.60	75.00
SUBTOTAL:		[17.00	2,680.00]
<u>HEORAL</u>			
11/16/2015	IMF Status apelacion / informacion; solicitando a Lic. Balzac / Lic. Negrón.	0.60	120.00
11/17/2015	EDC phone call with Atty. Balzac regarding debt certification and sworn summons.	0.30	37.50
11/18/2015	EDC Meeting with Atty. Fullana to discuss strategy and possible dismissal of complaint for lack of serve of summons.	0.60	75.00
	EDC Meeting with Atty. Fullana to discuss strategy of case in with of last court order and decision to appeal.	0.50	62.50
	IMF Discussion as to new defenses and motion to dismiss complaint.	0.80	160.00
11/24/2015	EDC Receipt, review and lodging of email from plaintiff regarding production of documents.	0.30	37.50
	EDC Drafted motion to dismiss.	2.80	350.00
11/27/2015	IMF Receipt new lodging email from Lic. Lugo, RE: authorization to file motion HEORAL.	0.60	120.00

			<u>Hours</u>	<u>Amount</u>
12/7/2015	EDC	Review and analyzed letter sent by clerk regarding Heoral previous appearance. Checked documents and found the Atty. Gaillardia appeared on behalf of Heoral.	1.20	150.00
12/8/2015	IMF	Conference, documents pertaining to appearance by Heoral.	0.60	120.00
12/9/2015	IMF	Receipt, review and lodging of memo from Lic. Negron as to property value. Email to Lic. Lugo.	0.80	160.00
12/21/2015	IMF	Receipt, review and lodging - reply to motion of dismiss. Discussion with Capdevila as a response to same.	0.80	160.00
	EDC	Meeting with Atty. Fullana regarding opposition to dismissal and discussion as to strategy.	0.80	100.00
	EDC	Drafted reply motion to Scotiabank's opposition to dismissal.	3.80	475.00
12/28/2015	EDC	Review and analyzed court order. RE: Motion to dismiss.	0.10	12.50
1/26/2016	EDC	Drafted motion for notice of proposed sale of the estate's interest in Heoral, S.E.	1.50	187.50
3/11/2016	EDC	Drafted partnership purchase agreement.	1.60	200.00
	EDC	Amendment draft of contract as instructed by Atty. Fullana.	0.40	50.00
	EDC	Drafted motion for Entry of Order for sale to be Free and Clear of liens.	1.30	162.50
	EDC	Email to Lemuel Negron, RE: sales contract.	0.30	37.50
3/14/2016	IMF	Phone call to Lic Lugo's office, RE: signing of counter part of sale agreement.	0.60	120.00
3/15/2016	IMF	Review draft proposed order.	0.60	120.00
	EDC	Drafted proposed order as requested from Court's law clerk.	0.80	100.00
3/16/2016	EDC	Phone call with Lemuel Negron, RE: partnership sale agreement.	0.30	37.50
	EDC	Email to Lemuel Negron, RE: HEORAL sale agreement.	0.30	37.50
3/29/2016	EDC	Email exchange with Mr. Lugo. Re: sale report of Heoral S.E.	0.40	50.00
SUBTOTAL:			[22.70	3,242.50]
For professional services rendered			39.70	\$5,922.50

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Isabel M. Fullana	12.80	200.00	\$2,560.00
capdevila	26.90	125.00	\$3,362.50

Additional Charges :

	<u>Amount</u>
11/12/2015 Doc 1301 filed 11/12/15 - Notice and certificate of mailing.	5.30
11/30/2015 Moción en sol de Desestimación Parcial.	3.00
Postage: Moción en solicitud de Desestimación Parcial.	3.00
12/15/2015 Memorandum a Lcdo. W. Lugo.	0.20
12/18/2015 Postage: carta a Lcdo Negrón.	0.50
Carta a Lcdo. Negrón.	0.20
12/21/2015 Replica a oposición A sol de Desestimación Parcial.	3.60
Delivery Cost	10.00
Radical Tribunal, Replica a Oposición a sol de Desestimación Parcial.	
12/22/2015 Fax: Replica a Oposición a sol de Desestimación Parcial enviada al Lcdo Balzac.	1.40
12/23/2015 Postage: Replica a Oposición a sol de Desestimación Parcial.	1.44
1/4/2016 Delivery Cost Oficina del Lcdo Wilberto Lugo	10.00
2/15/2016 Doc. 1307 filed 02/15/16 - Amended notice of proposed private sale.	14.40
3/3/2016 Postage: Doc 1307 filed 02/15/16 - Amended notice of proposed private sale.	36.00
3/15/2016 Special Partnership interest purchase agreement.	0.40
Total costs	<u>\$89.44</u>
Total amount of this bill	<u>\$6,011.94</u>

I HEREBY CERTIFY THAT THE PRESENT INVOICE HAS NOT BEEN PAID. PLEASE INCLUDE INVOICE NUMBER. THANK YOU.